

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

GEORGE A. TILLET, and GRACE L.  
TILLET, his wife.

Plaintiffs,

v.

CITY OF BREMERTON, et al.,

Defendants.

Civil Action No.: CO9-5621 RJB

DECLARATION OF GEORGE T. "TOM"  
TILLET IN SUPPORT OF PLAINTIFFS'  
RESPONSE TO SUMMARY JUDGMENT

I, George T. "Tom" Tillett, worked with my father, George A. Tillett, full-time for 32 years—for 5–6 days per week—and had began working as a part-time helper/apprentice for six years prior to that, beginning when I was 13 years old. He had a parts store for many years downtown. When it closed, he moved into the office area of my garage with what was left of his inventory. He sold to a few old customers but primarily provided me with parts for when I worked on vehicles—which I did along with operating a machine shop, a partnership we had had for years. As a result of our close and lengthy working relationship, which continued until he died in November, 2009, I knew my father and his personality very well. If he had any significant physical problems, he would always let me know. If he would have had a broken hand prior to the police raid on September 10, 2008, he would have told me. At that point my father's health was good, his early cancer was in remission, and he was not complaining to me of any ailments. After the raid, he was never the same, and I believe the treatment he received hastened his death.

On September 10, 2008, the day the Bremerton Police Department raided my home at 1718 Sheridan (which is outside the Bremerton city limits), my father and I were working together at the shop. He was in the office area, which contained his vehicle parts and a typical

1 parts counter with parts reference books. I have attached hereto two pictures of the shop,  
2 Exhibits 17 and 10, and which accurately depict the office on the day of the raid. (I am using  
3 what I understand to be the deposition exhibit numbers on the attached pictures.) Exhibit 17  
4 accurately shows the parts counter; and Exhibit 10 accurately shows the view of the office from  
5 the interior door leading to the shop. Exhibit 10 also shows the door leading to the outside, past  
6 which the police had to go to enter the front door of the house. Because the weather was warm  
7 that day, that outside door was open during the raid when the police went past.  
8

9 Just minutes before the raid, I spoke with my father as he was seated on his chair at the  
10 parts counter. He had been there since about 8:30 that morning, and I had already spent about  
11 half an hour speaking with him by that time. I had come in the back from the garage to get a part  
12 for the vehicle I was working on at the time. As was our practice, when my father provided me a  
13 needed part, he would immediately fill out or add to an invoice to bill to the customer. As I stood  
14 there on the left end of the counter, and to his left, I observed him writing the invoice. He used  
15 his left hand to hold the paper and he wrote on it with his right hand. I had a clear view of his  
16 hands as he did so and there were no bruises or swelling on them. In addition, he had no problem  
17 using his hands, manifested no pain or discomfort while he was writing and made no complaints  
18 during or after writing. Nor had he had any such problems that day or the previous days.  
19

20 As he was writing, I returned to the garage. As it turned out, the police had already gone  
21 past the outside door to the shop and had entered the house. I heard noises at that time and went  
22 to the garage door to look outside. I am also Exhibits 45 and 7, which accurately depict the  
23 outside of the building that day. Exhibit 45 shows the garage where I went to look out from the  
24 inside. Exhibit 7 shows the entry to our front porch, looking along the side of the garage. Also  
25 in the picture are the outside doorway to the office on the left, as well as the gate the police had to  
26

1 enter to get to our front door. The light-colored structure in the upper right of the picture was up  
2 against the fence and was a 12x24 foot temporary single-car "garage" tent with a tarp covering.  
3 The width of the front of the tent opposite the door to the office was 12 feet; the structure was  
4 about eight feet from the building.  
5

6 As I opened the garage door from the inside, a policemen win plain clothes stuck a gun in  
7 my face, identified himself in a loud voice as "Police", grabbed me, pulled me out of the garage  
8 and made me stand by the front of the Acura depicted in Exhibit 45. He did not throw me on to  
9 the ground or handcuff me. I did what he said to do. He instructed a uniformed Bremerton police  
10 officer, who was between the Acura and the tent, to watch me. The uniformed officer did not say  
11 anything to me at that time.  
12

13 After about ten minutes, my wife Nancy and another woman were brought out in  
14 handcuffs and placed near the front of the tent. About then I began hearing the sounds of a  
15 commotion coming from the office, but I did not know what was happening. I then saw two  
16 other plainclothes police officers bring my father out from the office. I could see at that time my  
17 father had a large bruise on his head and was handcuffed. Because of the way they were holding  
18 him, I could see his right hand was also deeply bruised and a sickly purple color. One officer was  
19 holding my father's hands from behind, crimping one thumb to use pain to help move him, while  
20 at the same time pulling up hard on his hands with his arms extended all the way back. This was  
21 done so forcefully that my father's head was forward and somewhat downward, and seemed to be  
22 causing him extreme pain. My father was also crying and tears were running down his face.  
23

24 The sight of my father crying deeply affected me. My father was not what I would  
25 consider an emotional man, and to see tears coming down his face angered me greatly. The only  
26 other times I can remember having seen my father shed tears was at the deaths of his parents. I

1 began toward him to protect him, but was prevented from going to him by the uniformed officer.

2 I was placed in the back of his patrol car.

3 I and was later taken to the jail where I was booked and released.<sup>1</sup> I then called my father  
4 and asked for a ride home. I began making my way home when my father met me at Rogers  
5 Street. When he pulled over the car, he asked me to drive as he said his hands and ribs hurt too  
6 much for him to drive. I could see at the time he was having difficulty driving because of his  
7 hands. I saw at that time not only the bruise I had seen before on his right hand, I also saw a gash  
8 on his right hand or wrist and also that his left hand bruised in the same manner as the right hand.  
9 As I drove, I also saw him pressing his forearm against his rib area as if his ribs were in pain, and  
10 I also noticed he had labored breathing, and was seeming to breathe with difficulty. I had seen  
11 none of these physical problems as of the moment I had left him in the office writing on the  
12 invoice just moments prior to being aware of the raid.  
13  
14

15 Unlike his usual daily weekday pattern since January, 2006, my father did not come to the  
16 office for at least three weeks. Two days after the raid, I contacted my father to ask him to help  
17 me contact a bail bondsmen to bail out my wife, who had also been arrested. My father again  
18 asked that I drive. When we got to the bail bondsmen, my father was unable to make out the  
19 check to the bondsmen because of the injuries to his hands, so I had to do it for him. I also signed  
20 it for him at his request.  
21

22 I declare under penalty of perjury under the laws of the state of Washington that the  
23 foregoing is true and correct. Signed this 6<sup>th</sup> day of December, 2010, at Bremerton, Washington.

24   
25 George T. "Tom" Tillett  
26

<sup>1</sup> I was charged in Bremerton Municipal Court but the charge was dismissed when I complained about the lack of jurisdiction because no county officers were involved in the raid or arrest.

DECLARATION OF GEORGE TILLET, JR. IN SUPPORT OF  
PLAINTIFF'S RESPONSE TO SUMMARY JUDGMENT

- Page 4 of 4  
CO9-5621 RJB

**Preble Law Firm, P.S.**  
Attorneys at Law  
Sinto & Sawyer Building, Suite 101  
2120 State Avenue N.E.  
Olympia, Washington 98506  
(360) 943-6960 FAX: (360) 943-2603

1 began toward him to protect him, but was prevented from going to him by the uniformed officer.  
 2 I was placed in the back of his patrol car.

3 I and was later taken to the jail where I was booked and released.<sup>1</sup> I then called my father  
 4 and asked for a ride home. I began making my way home when my father met me at Rogers  
 5 Street. When he pulled over the car, he asked me to drive as he said his hands and ribs hurt too  
 6 much for him to drive. I could see at the time he was having difficulty driving because of his  
 7 hands. I saw at that time not only the bruise I had seen before o his right hand, I also saw a gash  
 8 on his right hand or wrist and also that his left hand bruised in the same manner as the right hand.  
 9 As I drove, I also saw him pressing his forearm against his rib area as if his ribs were in pain, and  
 10 I also noticed he had labored breathing, an was seeming to breathe with difficulty. I had seen  
 11 none of these physical problems as of the moment I had left him in the office writing on the  
 12 invoice just moments prior to being aware of the raid.  
 13  
 14

15 Unlike his usual daily weekday pattern since January, 2006, my father did not come to the  
 16 office for at least three weeks. Two days after the raid, I contacted my father to ask him to help  
 17 me contact a bail bondsmen to bail out my wife, who had also been arrested. My father again  
 18 asked that I drive. When we got to the bail bondsmen, my father was unable to make out the  
 19 check to the bondsmen because of the injuries to his hands, so I had to do it for him. I also signed  
 20 it for him at his request.  
 21

22 I declare under penalty of perjury under the laws of the state of Washington that the  
 23 foregoing is true and correct. Signed this 6<sup>th</sup> day of December, 2010, at Bremerton, Washington.  
 24

25 \_\_\_\_\_  
 George T. "Tom" Tillett

26 \_\_\_\_\_  
<sup>1</sup> I was charged in Bremerton Municipal Court but the charge was dismissed when I complained about the lack of jurisdiction because no county officers were involved in the raid or arrest.

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

GEORGE A. TILLET, and GRACE L.  
TILLET, his wife.

Civil Action No.: CO9-5621 RJB

Plaintiffs,

v.

DECLARATION OF FACSIMILE  
TRANSMISSION

CITY OF BREMERTON, et al.,

Defendants.

I declare under penalty of perjury under the laws of State of Washington that I have examined the Declaration of George T. "Tom" Tillett in Support of Plaintiff's Response to Summary Judgment. I have determined it consists of 5 pages including this declaration and that it is complete and legible. I emailed the Declaration of George T. "Tom" Tillett in Support of Plaintiff's Response to Summary Judgment in its entirety and I have received back by facsimile the signature page of the declaration dated December 6, 2010. I have determined the signature page consists of 1 page and that it is complete and legible, signed by George T. "Tom" Tillett. After he had signed and approved the document, I noticed that the footer was incorrect and changed the footer, though the incorrect footer remains on his signature page. He has approved the changes I made.

Signed at Olympia, Washington, on December 6, 2010.

GARY A. PREBLE

**Preble Law Firm, P.S.**

Attorneys at Law  
State & Sawyer Building, Suite 101  
2120 State Avenue N.E.  
Olympia, Washington 98506  
(360) 943-6960 FAX: (360) 943-2603